



CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

ENTERED

THE DATE OF ENTRY IS ON
THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

Signed May 1, 2024

United States Bankruptcy Judge

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	
	§	Case No. 22-31641-mvl-7
GOODMAN NETWORKS, INC.,	§	
	§	(Chapter 7)
Debtor.	§	
	§	
	§	
SCOTT M. SEIDEL, <i>et.al.</i> ,	§	
	§	
Plaintiffs,	§	ADVERSARY PROCEEDING
	§	NO: 23-03090-mvl
v.	§	
	§	
HUDSON CLEAN ENERGY	§	
ENTERPRISES, LLC, <i>et al.</i> ,	§	
	§	
Defendants.	§	

AGREED SCHEDULING ORDER

Pursuant to Rule 16, Federal Rules of Civil Procedure, and the parties' agreement as reflected herein, the Court issues the following scheduling order to supersede any prior scheduling order entered in this proceeding:

IT IS ORDERED THAT:

1. Docket call for this Adversary Proceeding will be held on the Court's **May, 2025** trial docket call day, tentatively estimated at May 6, 2025 at 1:15 p.m., but the parties are directed to obtain the precise setting once the Court issues its 2025 calendar.

2. Trial of this Adversary Proceeding will be held during the Court's trial week for **May, 2025**, tentatively estimated at May 12, 2025, but the parties are directed to obtain the precise setting once the Court issues its 2025 calendar.

3. Parties shall complete fact discovery on or before **December 20, 2024**. Expert discovery shall be completed by **February 28, 2025**. Discovery must be served promptly enough to permit response by the other party prior to the end of the discovery period. Parties may, by agreement, continue discovery beyond this deadline without further order of this Court.

4. Non-expert initial disclosures are waived.

5. Parties shall exchange names, addresses and reports of experts for trial on or before **December 20, 2024**.

6. Rebuttal expert reports shall be exchanged on or before **February 14, 2025**.

7. All dispositive motions shall be filed and served on all other parties on or before **March 7, 2025**. Responses shall be filed and served on all other parties not later than 21 days of the service of the motion. Any replies shall be filed and served on all other parties not later than 14 days of the service of the response.

8. Except for impeachment documents, all exhibits, along with a list of witnesses to be called, shall be exchanged with all other parties no later than **May 1, 2025**. The identification of witnesses to be called by deposition shall include page and line designations of deposition testimony. Counter designations of deposition testimony shall be exchanged with all other parties no later than **May 6, 2025**. All exhibits and designation of deposition testimony not objected to in

writing by Docket Call shall be admitted into evidence at trial without further proof, except for objections to relevance. Written objections to exhibits will be taken up either at the beginning or during the course of the actual trial or at any pretrial conference.

9. On or before **May 1, 2025**, a Joint Pretrial Order in compliance with Local District Court Rule 16.4 shall be filed, served, and uploaded for Court entry. All parties are responsible for preparing the Joint Pretrial Order, which shall contain the following: (a) a summary of the claims and defenses of each party; (b) a statement of stipulated facts; (c) a list of the contested issues of fact; (d) a list of contested issues of law; (e) an estimate of the length of trial; (f) a list of additional matters which would aid in the disposition of the case; and (g) the signature of each attorney.

10. On or before **May 1, 2025**, the parties shall file proposed findings of fact and conclusions of law.

11. On or before **May 1, 2025**, the parties shall file trial briefs addressing contested issues of law.

12. This Order, and each party's agreement to this Order, is wholly without prejudice to all issues concerning the Court's core or non-core jurisdiction, or the lack thereof, or the lack of any consent to this Court's entry of final judgment, or to any motion for withdrawal of the reference, and all rights, issues, objections, defenses, and arguments concerning any of the foregoing are preserved and may be asserted by each party as is otherwise appropriate notwithstanding the entry of this Order; *provided, however*, that any motion for the withdrawal of the reference should be filed no later than **October 31, 2024**, but, if filed thereafter, or if not granted prior to trial, the Court shall proceed to trial without prejudice to any reference withdrawal issue and, if the Court or the District Court determines that this Court's jurisdiction is not core, then this Court shall make a report and recommendation to the District Court as is otherwise

appropriate if the District Court has not by then entered an order providing otherwise (or unless a party obtains a stay from any court pending the same).

END OF ORDER

AGREED:

<p>MUNSCH HARDT KOPF & HARR P.C.</p> <p><u>/s/ Davor Rukavina</u> Davor Rukavina, Esq. Texas Bar No. 24030781 500 North Akard St., Ste. 3800 Dallas, Texas 75201 Telephone: (214) 855-7500 drukavina@munsch.com</p> <p>ATTORNEYS FOR THE PLAINTIFFS</p>	<p><u>/s/ Jason M. Rudd (w/ permission)</u> Jason M. Rudd, Tex. Bar No. 24028786 Paul T. Elkins, Tex. Bar No. 24092383 WICK PHILLIPS GOULD & MARTIN, LLP 3131 McKinney Avenue, Suite 500 Dallas, TX 75204 Phone: (214) 692-6200 Fax: (214) 692-6255</p> <p>COUNSEL FOR DEFENDANT JAMES FRINZI</p>
<p>PULMAN, CAPPUCCIO & PULLEN, LLP</p> <p>2161 NW Military Highway, Suite 400 San Antonio, Texas 78213 www.pulmanlaw.com (210) 222-9494 Telephone (210) 892-1610 Facsimile By: <u>/s/ Leslie Sara Hyman (w/ permission)</u> Randall A. Pulman Texas State Bar No. 16393250 rpulman@pulmanlaw.com Leslie Sara Hyman Texas State Bar No. 00798274 lhyan@pulmanlaw.com Anna K. MacFarlane Texas State Bar No. 24116701 amacfarlane@pulmanlaw.com</p> <p>ATTORNEYS FOR DEFENDANTS JAMES GOODMAN; GOODMAN INVESTMENT HOLDINGS, LLC; GENESIS NETWORKS, INC.; GENESIS NETWORKS GLOBAL SERVICES, LLC</p>	<p>JORDAN, LYNCH & CANCIENNE PLLC</p> <p>By: <u>/s/ Michael Cancienne (w/ permission)</u> Michael Cancienne State Bar No. 24046330 Joseph (“Jeb”) W. Golinkin II State Bar No. 24087596 1980 Post Oak Blvd., Ste. 2300 Houston, Texas 77056 713-955-4020 (Telephone) 713-955-9644 (Fax) mcancienne@jlcfirm.com jgolinkin@jlcfirm.com</p> <p>ATTORNEYS FOR HUDSON CLEAN ENERGY ENTERPRISES, LLC; ALLIANCE TEXAS HOLDINGS, LLC; NEIL Z. AUERBACH; JUDITH AUERBACH; AUERBACH PARTNERS, L.P.; AUERBACH CHILDREN’S DYNASTY TRUST U/A/D OCTOBER 9, 2012; and AUERBACH FAMILY DYNASTY TRUST U/A/D OCTOBER 9, 2012</p>